

**Comment in Response to Access Health CT's  
Draft Policies and Procedures: All-Payer Claims Database  
September 12, 2013**

This comment is submitted on behalf of the Connecticut Business & Industry Association ("CBIA") in response to Access Health CT's Draft Policies and Procedures: All-Payer Claims Database. CBIA wishes to emphasize the importance of establishing and maintaining separation and distinction between Access Health CT and the All-Payer Claims Database ("APCD").

The APCD is a tool that stakeholders throughout the state may utilize to gain information on healthcare cost and quality with the goal of enhancing outcomes and improving efficiency. Keeping such an important evaluation tool separate is critical to its effectiveness for the healthcare community and the general public.

Since the APCD is established to benefit stakeholders throughout Connecticut it is essential that all stakeholders have an equal opportunity to utilize the information submitted through the APCD program. Further, Reporting Entities must be secure that their data submissions to the APCD are available on a level playing field to all stakeholders to review and utilize.

A substantive firewall between Access Health CT and the All-Payer Claims Database will help ensure that the information collected from Reporting Entities is available to all stakeholders on an equal basis.

Thank you for the opportunity to offer CBIA's comments.